

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA

v.

CRIMINAL CAUSE NO. 3:24cr103DPJ-LGI

AARON B. BANKS

**UNOPPOSED MOTION FOR LEAVE TO FILE OUT-OF-TIME RESPONSE TO THE
GOVERNMENT’S MOTION FOR PROTECTIVE ORDER**

COMES NOW, the Defendant, Aaron B. Banks, by and through his undersigned counsel of record, and files this, his Unopposed Motion for Leave to File Out-of-Time Response to the Government’s Motion for Protective Order. [Ct. Doc. No. 49]. The undersigned requests the leave to file forthwith Mr. Banks response to the Motion for Protective Order because the undersigned’s recent trial schedule and holiday travel schedule prevented him from submitting the Defendant’s response, noting his objection to the subject motion and explaining why he agrees in part and opposes in part, the Government’s requested relief. Mr. Banks’ proposed Response is attached to this motion as Exhibit “A.”

The undersigned has conferred with Assistant United States Attorney Chet Kirkham about the foregoing Motion for Leave to File Out of Time Response. AUSA Kirkham informed the undersigned that he does not oppose Mr. Banks’ request to file the brief because of the undersigned’s resent trial and travel issues.

WHEREFORE, PREMISES CONSIDERED, Ms. Banks respectfully requests this Court grant Ms. Banks’s Motion for Leave to File Defendant’s Out-of-Time Response to the

Government's Motion for Protective Order and for such other relief as is warranted under these circumstances.

RESPECTFULLY SUBMITTED, this the 31st day of December, 2024.

s/E. Carlos Tanner, III
E. CARLOS TANNER, III MSB# 102713
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CERTIFICATE OF CONFERENCE

I, E. Carlos Tanner, III, do hereby certify that on this date, I have conferred with Assistant United States Attorney Chet Kirkham about the foregoing Motion for Leave to File Out of Time Response to the Government's Motion for Protective Order. AUSA Kirkham informed the undersigned that he does not oppose the relief the defense seeks in the instant motion.

ON THIS the 31st day for December, 2024.

s/E. Carlos Tanner, III
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CERTIFICATE OF SERVICE

I, E. Carlos Tanner, III, do hereby certify that on this date, December 31, 2024, I have electronically filed the foregoing Motion for Leave to File Out of Time Response via the ECF system, which caused to be delivered a copy of the same to all counsel of record in this cause.

ON THIS the 31st day for December, 2024.

s/E. Carlos Tanner, III

E. CARLOS TANNER, III, MSB# 102713

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